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TO: Income Maintenance Supervisors
Income Maintenance Lead Workers
Income Maintenance Staff
W-2 Agencies
Workforce Development Boards
Job Center Leads and Managers
Training Staff
Child Care Coordinators

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BEM/DWS OPERATIONS MEMO			
No: 06-13 Updated 3-23-06			
DATE: 03/08/2006			
FS	<input type="checkbox"/>	MA	<input checked="" type="checkbox"/>
CTS	<input type="checkbox"/>	CC	<input type="checkbox"/>
FSET	<input type="checkbox"/>	EA	<input type="checkbox"/>
JAL	<input type="checkbox"/>	JC	<input type="checkbox"/>
WIA	<input type="checkbox"/>	Other	<input type="checkbox"/>
		EP	<input type="checkbox"/> ★
PRIORITY: HIGH			

SUBJECT: Medicaid Verification Policy Changes

CROSS REFERENCE: Operations Memo's 02-11, 03-36
CARES Guide Chapter 10 – Data Exchange
CWW Process Guide – Chapter 44

EFFECTIVE DATE: April 1, 2006

PURPOSE

The purpose of this memo is to provide information about and clarification of changes to the Medicaid (MA) verification policy, including:

1. Missing information on application and recertification forms,
2. Definition of "questionable",
3. Verification of income, and
4. Utilizing existing Data Exchange resources.

BACKGROUND

MA Program Simplification was introduced in 2001 to offer a more client friendly program for customers and reduce workload for the local agencies administering the program. While we believe that these objectives were largely achieved, MA program reviews have subsequently confirmed that self-declared income is frequently contradicted by third party data exchange

information. This finding underscores the importance of consistently utilizing available data exchange information for the purpose of accurately determining MA eligibility. Further, it was this finding that prompted the Department to include a proposal in the 2005-2007 biennial budget request designed to strengthen the MA income verification policy.

The changes and clarifications outlined in this document will give local agencies administering MA additional guidance in determining: 1) what to do with unclear or incomplete MA applications, 2) when it is appropriate to accept self-declared income and 3) when to use data exchanges to determine if self-declared income is questionable.

POLICY

Effective April 1, 2006, follow the guidelines detailed below when reviewing information submitted at application, review, person add and when a change is reported.

MISSING APPLICATION AND RECERTIFICATION INFORMATION

Previously, when an application or recertification form was received with information missing, a worker assumed the answer to be “No” or “Zero”.

Effective April 1, 2006, when an application or recertification form is missing information needed to determine eligibility, do not assume the answer is “No” or “Zero.” Instead, make a written or verbal request for the information. A written request is preferable, but if making a verbal request be sure to document that a request was made.

1. If missing information is not provided timely, deny/terminate eligibility.
2. If missing information is provided timely, determine if the self-declared information is questionable.
 - a. If not questionable, follow established procedure for case processing.
 - b. If questionable, request verification.

Note: Only when all the information needed to make an eligibility determination is available, can the worker review that information and seek verification of questionable items:

- If verification is not provided timely, deny/terminate benefits.
- If verification is provided timely, follow established procedure for case processing.

DEFINITION OF "QUESTIONABLE"

Verification is required if information is "questionable." Information is questionable when it is one or more of the following:

- Current policy:
- Inconsistent with other information supplied by the group
 - Inconsistent with information from a trusted third party source
 - Supplied by a client who is unsure of its accuracy
 - Supplied by a client who has been convicted of, or who has legally acknowledged his/her guilt of Medicaid fraud.
 - Supplied by a minor who claims to be living alone (unless applying only for the Family Planning Waiver Program).

- Addition to current policy:
- Unclear or vague (i.e., information provided, but not clear)
 - **Income** will not be available on any data exchange accessible by IM workers. (See **Data Exchange Not Available** on page 4)

Verify questionable information at application, review, person add and when a change is reported.

VERIFICATION OF INCOME

Current policy requiring the verification of questionable self-declared income is not changing. Current policy requiring that available data exchange information be compared to self-declared income is not changing. What is changing is the verification policy covering circumstances when data exchange information is not available.

Data Exchange is Available

DHFS will continue to accept self-declared earned and unearned income information for MA cases if an automated data exchange is or will be available to support the information provided. This means that even though an income amount is self-declared by the customer, that amount must be compared to a data exchange amount when it is available. The following are the current data exchanges available to compare to self declared information:

Type of Match	Information in the Match
Wage Match	Earned income information
New Hire Query	New employment information
Unemployment Insurance Benefit Summary	Unemployment income information
KIDS	Child support income and information
Social Security (SOLQ)	Social Security income and other information from the Social Security Administration
Supplemental Security Income (SOLQ)	Supplemental Security income and other information from the Social Security Administration

If data exchange information is, or will be available, it must be compared to the income amount(s) self-declared at application, review or when a change is reported.

If the self-declared income is different than what is found through review of the data exchange and that difference is enough to impact eligibility, benefit level, or cost share, consider the self-declared income to be questionable and obtain verification. If the difference between the self declared and data exchange is not enough to impact eligibility, benefit level, or cost share,

accept the self-declared information, document in Case Comments why it was accepted, and confirm eligibility.

Agencies are encouraged to continue to use their best judgment when comparing and resolving self declared information and data exchange information.

Data Exchange Not Available

In certain cases, data exchange resources do not exist or are unavailable to IM workers for eligibility determinations. For example, data exchange resources are not available for persons who do not supply their SSN or where the income reported is not part of an existing data exchange. **Under these circumstances, self-declared income is not acceptable and must be verified.**

The following are examples of persons for whom a data exchange will never exist and, therefore, income verification is required at eligibility determination:

- Ineligible persons who do not provide an SSN and whose income would be counted in the eligibility determination (Fiscal Test Group member);
- Non-citizens without an SSN applying for emergency services or the BadgerCare Prenatal Program;
- Persons whose employers do not report wages to the Department of Workforce Development (DWD) in Wisconsin, such as Wisconsin residents who work out of state and persons who work for the federal government.
- Persons with income from sources that are never available to IM workers through a data exchange, such as self-employment, pensions, retirement income, dividends, interest, etc.

UTILIZING EXISTING DATA EXCHANGE RESOURCES

Data exchanges must be used to the extent they are available. This means that self-declared income must be compared to available data exchange information. A determination must then be made as to whether the self-declared information is “questionable” and whether to obtain verification.

DATA EXCHANGE

Refer to the CARES Guide Chapter 10 and the CWW Process Help Chapter 44 for more information on the data exchange processes available.

ATTACHMENT

MA Verification Process Flow

OTHER PROGRAMS

The verification policy for FoodShare (FS) has not changed. Continue to follow the same verification process as outlined in the FSH 1.2

CONTACTS

BEM CARES Information & Problem Resolution Center

★Program Categories – FS – FoodShare, MA – Medicaid, SC – Senior Care, CTS – Caretaker Supplement, CC – Child Care, W-2 – Wisconsin Works, FSET – Food Stamp Employment and Training, CF – Children First, EA – Emergency Assistance, JAL – Job Access Loan, JC - Job Center Programs, RAP – Refugee Assistance Program, WIA – Workforce Investment Act, Other EP – Other Employment Programs.

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